



Site:	Chem. Comma Shawnee
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June 15, 1989

**MEMORANDUM**

**SUBJECT:** Proposed Additional Sampling Activities  
Chemical Commodities, Inc., Shawnee, Kansas

**FROM:** Mark T. Roberts  
SINV/EP&R/ENSV

**TO:** Paul E. Doherty, Chief  
SINV/EP&R/ENSV

The following proposal delineates additional sampling activities to be undertaken in the evaluation of potential contaminant releases from the Chemical Commodities, Inc. (CCI) warehouse facility located at 20201 West 55th Street, Shawnee, Kansas. This proposal incorporates recommendations provided in a data review (dated April 14, 1989) which summarized the results of EP&R sampling activities conducted at the Shawnee warehouse on December 15, 1988. Investigative actions proposed in a draft sampling plan prepared by SPFD/REME (dated May 31, 1989) have also been considered in the development of this proposal, as have observations recorded during a site reconnaissance performed by EP&R and TAT personnel on May 18, 1989.

**SAMPLING RATIONALE**

In the past, the CCI Shawnee warehouse has received periodic scrutiny from agencies at all levels of government. Various inspection reports associated with the facility have cited poor housekeeping practices and the improper storage of hazardous chemicals, but have provided only limited evidence of the release of hazardous materials to the environment. The analytical results associated with soil samples collected from surface drainage pathways (both onsite and offsite) in December 1988, indicated elevated levels of chromium, dieldrin, and endrin at locations downgradient of CCI storage facilities. The detected levels, however, did not represent an immediate concern considering the rural setting of the property. Further, the elevated concentrations that were reported could only be circumstantially traced to CCI operations.

Due to the limited evidence of environmental releases at the CCI Shawnee warehouse, a phased investigative approach is proposed herein. The scope of work recommended for the upcoming initial sampling phase is designed to characterize potentially contaminated environmental media in areas of the site which have

MR:th: 6/15/89

CC: John Velvig, EP&R  
Steven Jones, SPFD

John King, EYE/TAT

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Date	06/15/89	6/20/89	6/20/89	6/19/89			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

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Due to the limited evidence of environmental releases at the CCI Shawnee warehouse, a phased investigative approach is proposed herein. The scope of work recommended for the upcoming initial sampling phase is designed to characterize potentially contaminated environmental media in areas of the site which have been identified through earlier investigations as being likely

areas of contaminant deposition. Once the results of the initial sampling phase are received and evaluated, a determination of the need to expand site characterization activities can be made. The following areas have been identified as targets for characterization during the initial sampling phase:

- 1) Subsurface soils in the area of a suspected septic field in the northeast corner of the property represent a medium of primary concern due to the reported spillage of various chemicals within the main warehouse. A trench-type floor drain inside the warehouse exits the building at its northeast corner. Although the exact nature of the drainage system which receives flow from the floor drain could not be identified by CCI owner Jerald Gershon, it is assumed to be some type of subsurface infiltration field due to the lack of sewer connections at the site.
- 2) Subsurface soils at the southeast corner of the main warehouse represent a second area of concern due to reports of drum leakage at this location in the 1970's. The reports, filed by the Kansas Department of Health and Environment (KDHE), identified the contents of one such drum as chloroform.
- 3) Subsurface soils immediately east of the pole barn are a third target for the initial sampling phase. The pole barn is located south of the main warehouse and has been used for the storage and loading of various chemical products. Haphazard storage practices in the pole barn have been reported by investigators in the past. Furthermore, the structure is located on the downgradient (eastern) portion of the property and, during intense rainfall, surface water runoff has been observed by KDHE investigators to flow through the stored materials and out the open east side of the barn. These observations, coupled with the analytical results associated with surface soil samples collected east of the barn in December 1988, warrant the additional characterization of the soil profile in this area.

#### SCOPE OF WORK

As described above, subsurface soils are the primary medium of concern in the initial sampling phase. It is expected that the analytical data generated from the samples below will be sufficient to determine whether a significant release has occurred at the CCI Shawnee facility. Samples will be submitted for the following analyses: volatile organics, GC/MS scan, and metals. If it is determined that such a release has occurred, a second investigative phase will be designed to define the extent of contamination. Depending on the nature and location of the contaminants encountered, follow-up activities may include a soil gas survey, groundwater characterization, and/or additional soil sampling.

## Subsurface Soils -- Septic Field

A total of nine subsurface soil samples will be collected from three locations in the area suspected to comprise a drainage field at the northeast corner of the CCI property. The sampling locations (to be determined in the field) will be located at various distances from the warehouse and will define a line from the exit point of the interior floor drain to a downgradient point near the eastern CCI property line. At each sampling location, variable depth samples shall be collected and shall be representative of materials that would be impacted by the infiltration of contaminated drainage from the warehouse. The samples will be collected via hydraulically-driven, thin-walled samplers at depths of 3.0, 4.5, and 6.0 feet below grade.

In order to characterize materials available for release to the drainage field, a sweep sample will be composited from the exposed segments of the interior floor drain.

## Subsurface Soils -- Area of Reported Drum Leakage

Variable depth soil samples will be collected from the area at the southeast corner of the warehouse where leaking drum(s) were reportedly staged in the late 1970s. An initial sample will be collected at the gravel/soil interface, and two additional samples will be collected at 1.5 foot intervals. The samples will be collected with hydraulically-driven, thin-walled samplers.

## Subsurface Soils -- Area East of Pole Barn

Variable depth soil samples will be collected from a location adjacent to the loading dock on the east side of the pole barn. Three samples will be collected at this location (via thin-walled samplers) in order to characterize potential contaminants in the soil profile from the surface to approximately 4.5 feet below grade.

## Additional Site Characterization Activities

The following site activities are proposed for inclusion in the initial sampling phase, but are contingent on site conditions encountered.

1. In order to characterize potential downgradient shallow groundwater contamination, a survey of existing groundwater wells in the immediate area of the CCI warehouse will be conducted. Samples will be collected as appropriate.
2. In order to complete the inventory of materials stored in the pole barn (an inventory conducted in December 1988, documented various unknown materials), on-site hazcat analyses will

be performed with samples of unidentified materials. Laboratory analyses will be requested according to the results of the hazcat work.

3. In order to better define the nature of potential off-site contaminant releases, a sediment sample will be collected from a parking lot drain which lies directly east of the pole barn on adjoining property. This drain receives the majority of runoff from the CCI parking area as well as from the pole barn.

4. Appropriate samples will be collected to satisfy background and QA/QC sampling requirements.

#### RESOURCE REQUIREMENTS/TENTATIVE SCHEDULING

EP&R and TAT personnel will perform the sampling as described above. It is anticipated that field activities can be completed by a 4-person investigative team in two days. Scheduling of field work will be expedited once the sampling plan is approved and site access is arranged.

cc: John Helvig, EP&R  
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